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DATE FILED: 12/22/2017

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
LAMONT EVANS, :  
EMANUEL RICHARDSON, a/k/a "Book," :  
ANTHONY BLAND, a/k/a "Tony," :  
CHRISTIAN DAWKINS, and :  
MERL CODE :  
:  
Defendants. :  
:  
- - - - -x

PROTECTIVE ORDER  
ADDENDUM

17 Cr. 684 (ER)

WHEREAS, on or about November 22, 2017, the United States of America, with the consent of all defendants, sought a protective order to provide in unredacted form certain evidence pursuant to Rule 16 of the Federal Rules of Criminal Procedure;

WHEREAS, this Court entered that protective order (the "Protective Order") on or about November 27, 2017;

WHEREAS, the defendants may have access to material obtained from sources other than the Government as produced through discovery, including material obtained pursuant to a subpoena authorized pursuant to Fed. R. Crim P. 17 or through voluntary disclosures (collectively "Independently Obtained Material");

WHEREAS some of the Independently Obtained Material may pertain to two law enforcement officers, identified in the criminal complaint *United States v. Evans et al.*, 17 Mag. 7119,

as UC-1 and UC-2, respectively, whose identities, if publicly revealed could jeopardize ongoing investigations and the safety of UC-1 or UC-2;

IT IS HEREBY agreed, by and between the United States of America, Joon H. Kim, Acting United States Attorney, by Robert Boone, Edward B. Diskant, Noah D. Solowiejczyk, and Aline R. Flodr, Assistant United States Attorneys, of counsel, and defendants LAMONT EVANS, EMANUEL RICHARDSON, a/k/a "Book," ANTHONY BLAND, a/k/a "Tony," CHRISTIAN DAWKINS, and MERL CODE, by and through their respective counsel, that:

1. Any Independently Obtained Material that identifies either UC-1 or UC-2 by name, telephone number, address, voice, likeness or image, including but not limited to photographs and/or video recordings showing, in any way, UC-1 or UC-2; audio recordings involving the voice of UC-1 or UC-2; or documents containing any identification information regarding UC-1 or UC-2 shall be deemed "Confidential Information" subject to the terms of the Protective Order entered by this Court on November 27, 2017.

Dated: New York, New York  
December 22, 2017

SO ORDERED:

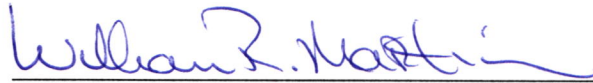


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THE HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK

**Consent of Entry of Protective Order**

I, William R. Martin, Esq., have read and reviewed the proposed Protective Order Addendum in the case of United States v. Lamont Evans, 17 Cr. 684 (ER), and I consent to the entry of the Order on behalf of my client, Lamont Evans.



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William R. Martin, Esq.  
Attorney for Lamont Evans

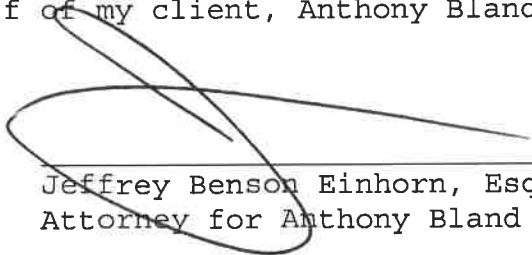
**Consent to Entry of Protective Order**

I, Craig J. Mordock, Esq., have read and reviewed the proposed Protective Order Addendum in the case of United States v. Emanuel Richardson, 17 Cr. 684 (ER), and I consent to the entry of the Order on behalf of my client, Emanuel Richardson.

s/\_\_\_\_\_  
Craig J. Mordock, Esq.  
Attorney for Emanuel Richardson

Consent to Entry of Protective Order

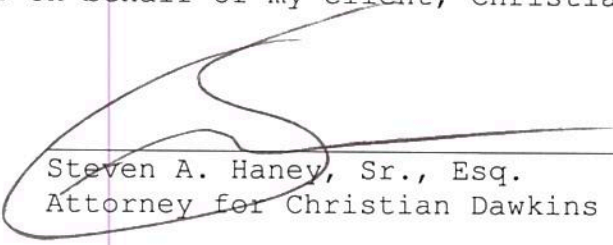
I, Jeffrey Benson Einhorn, Esq., have read and reviewed the proposed Protective Order Addendum in the case of United States v. Anthony Bland, 17 Cr. 684 (ER), and I consent to the entry of the Order on behalf of my client, Anthony Bland.



Jeffrey Benson Einhorn, Esq.  
Attorney for Anthony Bland

**Consent to Entry of Protective Order**

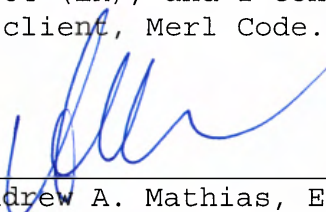
I, Steven A. Haney, Sr., Esq., have read and reviewed the proposed Protective Order Addendum in the case of United States v. Christian Dawkins, 17 Cr. 684 (ER), and I consent to the entry of the Order on behalf of my client, Christian Dawkins.



Steven A. Haney, Sr., Esq.  
Attorney for Christian Dawkins

**Consent to Entry of Protective Order**

I, Andrew A. Mathias, Esq., have read and reviewed the proposed Protective Order Addendum in the case of United States v. Merl Code, 17 Cr. 684 (ER), and I consent to the entry of the Order on behalf of my client, Merl Code.

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Andrew A. Mathias, Esq.  
Attorney for Merl Code